

Subject: Feedback on CBD Program Expansion

Introduction:

I commend the initiative to expand the Commercial Buildings Disclosure (CBD) Program. This is a significant step towards achieving Australia's net zero emissions target by 2050.

Support for the Expansion:

The proposed expansion to include hotels, shopping centres, data centres, and hospitals is crucial. These sectors account for substantial energy consumption and emissions. For instance, commercial buildings contribute to 25% of electricity use and 10% of total carbon emissions in Australia. Expanding the program will drive energy-efficient practices across more sectors.

Challenges and Solutions:

- 1. Implementation Costs:** Upgrading facilities can be financially burdensome. To address this, offer financial incentives or subsidies to support businesses during the transition. For example, grants or tax incentives for energy-efficient upgrades.
- 2. Monitoring and Compliance:** Ensuring compliance might be challenging. Develop a robust monitoring framework with clear guidelines, regular inspections, and penalties for non-compliance. Leveraging technology such as smart meters can aid in efficient monitoring.
- 3. Flexible Workspaces:** With the rise of remote work, reevaluating the necessity of large office spaces can lead to reduced energy consumption. Encourage businesses to adopt flexible workspaces.

Innovative Solutions:

- 1. Remote Work Initiatives:** Promote policies supporting remote working, reducing the need for large office spaces and energy usage.
- 2. Office Space Redesign:** Create energy-efficient, flexible office spaces for networking and collaboration rather than daily occupancy.
- 3. Rotating Office Spaces:** Encourage companies to implement rotating office space usage, maximizing space utilization and reducing the need for permanent large offices. This can also help in converting underutilized spaces into housing.
 - **New Business Model:** Develop secure, shared office spaces with minimal staff, secure storage areas, and essential amenities like filing rooms, desks, and boardrooms. Companies can rent these spaces on a rotating basis, reducing their need for permanent leases and enabling efficient space utilization. This approach caters to businesses operating primarily online, allowing them to meet in person as needed.

4. Housing Conversion: Convert underutilized office spaces into residential units to address housing shortages and enhance urban sustainability.

Additional Feedback:

1. Disclosure Triggers: Trigger disclosure not only on sale or lease but periodically, such as annually or biennially, to ensure continuous energy efficiency.

2. Scope of Information: Expand the scope to include Scope 1 emissions and the NABERS Renewable Energy Indicator, providing a comprehensive view of a building's environmental impact.

3. Minimum Energy Performance Standards (MEPS): Introduce MEPS for low-performing buildings. Provide clear guidelines and support to ensure compliance.

Conclusion:

The expansion of the CBD Program is a commendable initiative that will drive significant improvements in energy efficiency across various commercial sectors. By addressing the challenges and implementing innovative solutions, we can ensure a successful transition towards a sustainable future. At Rock Solid Design and Construction, we have firsthand experience in developing sustainable building solutions and believe that these recommendations will significantly contribute to achieving our environmental goals. I urge policymakers to consider these recommendations to strengthen the program and maximize its impact.